



May 27, 2025

Ms. Sarah L. Runyon
Acting Director, Technical Support Division
West Virginia Division of Highways
1900 Kanawha Blvd
East Building 5, Room 820
Charleston WV, 25305

Dear Ms. Runyon:

Formed in 1969 to advocate for protection of Virginia's most outstanding natural areas on public lands, the Virginia Wilderness Committee (VWC) is submitting the following comments for your consideration. The VWC is especially concerned about National Forest land that provides 1) clean water for municipal and aquatic use, 2) wildlife habitats that are home to countless animal and plant species, some found nowhere else on earth, and 3) outdoor recreation opportunities that are crucial to human health and quality of life. The VWC appreciated the public hearing held in Baker, WV on April 22, where we were able to talk with project engineers and other officials who provided answers to our questions. After attending the hearing and reading the draft Supplemental Environmental Assessment (SEA) for the Wardensville to Virginia State Line Project, we are submitting the following comments expressing concern about the SEA and the Refined Selected Alternative:

1. **Need for an EIS.** The EIS for the entire Corridor H was done three decades ago. A new EIS should be conducted for the Wardensville to State Line Project, given the significant environmental impacts this project would cause, as outlined below. The lack of analysis of the impacts on Virginia is a serious omission in the current SEA. Since this highway project first began, the landscape, and our associated knowledge, has evolved. More species are at risk due to pressures from a changing climate, human activity, and landscape alteration. Additionally, these decades have experienced changes in industry and economic drivers, populations of both rural and urban areas, and advancements in safety technology. While this project would drop heavy, fast traffic right at Virginia's border where existing infrastructure cannot handle this degree of influx, impacts on Virginia were omitted from this SEA. It would be

irresponsible to move forward with additional highway construction without a new EIS.

2. **Need for new alternatives analysis.** A much more extensive analysis of impacts and alternatives is needed, particularly of the currently omitted impacts to the Commonwealth of Virginia. Selection of the Refined Selected Alternative needs to be revisited and other alternatives reassessed due to the time that has passed since the EIS was completed as well as the new infrastructure that has been built since then, most notably the Rt. 50 4-lane just north of Wardensville. A new analysis must be done to determine the best way to meet the purpose and need of this portion of the Corridor H project. The alternatives analyzed should include:

- A no-build alternative
- An alternative that avoids the George Washington National Forest (GWNF)
- An alternative that focuses on improvements to SR 55 that will increase safety while decreasing impacts to public and private land

3. **No coordination with Virginia.** The goal of highways is to connect communities, cities, and states to make transportation easier and more efficient. Any road project that connects one state to another, especially for interstate transportation, should have interstate coordination. WVDOH has not coordinated the extension of Corridor H to the Virginia border with VDOT or the communities in Virginia that it will affect. It is incumbent on WVDOH to collaborate with VDOT and find a solution that is effective and mutually beneficial. Virginia has shown no interest in extending a 4-lane, as evidenced by the following:

- a. The Virginia Transportation Board does not have any plans to extend it.
- b. Shenandoah County and the City of Strasburg both passed resolutions opposing Corridor H in 2022.
- c. The Cedar Creek and Belle Grove National Historical Park lies in the pathway of an extension of Corridor H into Virginia. This celebrated landmark is a key educational site illustrating important Civil War and cultural history.
- d. Rt 55 in Virginia is a Virginia Scenic Byway, making it a poor choice for a 4-lane highway.

Please work with Virginia to find a solution that works for both states, their communities, and their local economies, while preserving their quality of life and their historical, ecological, and cultural resources.

4. **Route does not meet goal.** If the Project's goal is to increase safety, improve quality of life, and improve east-west transportation from Wardensville to the state line, this alternative does not meet that goal. With no interest on Virginia's part in extending Corridor H to Strasburg, WVDOH would be left

with a road that ends on top of Great North Mountain, frustrating drivers going east and putting an undue burden on communities in Virginia that do not want a highway.

5. **Impacts of Crossing Great North Mountain in the GWNF.** Forty-four percent of the proposed Wardensville to Virginia State Line Project passes through the GWNF as a 4-lane plus a slow traffic lane, making it a 5-lane highway. This 5-lane corridor is problematic for numerous reasons the draft SEA either ignores or does not adequately address:
 - a. **GWNF Scenic Corridor.** The SEA states that Refined Selected Alternative would go through Management Area 13 (Mosaics of habitat), which allows new road construction, but does not discuss the portion that goes through Management Area 7B (Scenic Corridor), which according to the 2014 GWNF Plan, emphasizes protection of scenic qualities, wildlife, and recreation. The desired conditions and management guidelines for Scenic Corridors do not support the level of disturbance and development of forest land that this project calls for. (See Appendix: GWNF Plan: 7B. Scenic Corridors) Construction of a temporary Rt 55 on Great North Mountain compounds the impact on the GWNF Scenic Corridor. The SEA omits any discussion of how the Refined Selected Alternative fails to comply with the GWNF 7B management prescription for Scenic Corridors.
 - b. **Fast traffic merging on mountaintop.** It would dump three lanes of eastbound traffic moving at 65 mph onto Rt.55, a 2-lane curvy highway that cannot handle the volume or speed. The SEA states that the end of the Refined Selected Alternative 4-lane will be pulled back 100', but it does not state where the 4-lane will end. Will it be 100' west of the state line or 100' west of some other point where the 4-lane was planned to end in 2003?
 - c. **Temporary Rt 55 Alternate Route.** The SEA fails to discuss construction of a Rt. 55 alternate route for traffic on the west side of Great North Mountain to use during construction of the Refined Selected Alternative 4-lane, which actually has 5 lanes on Great North Mountain. This alternate Rt. 55 road construction will significantly expand the footprint of disturbance in the GWNF. Even though this temporary 2-lane road will be closed eventually, the negative impacts on wildlife, intact forests, scenic characteristics, and migration of species will be lasting. This temporary Rt. 55 was on the maps on display at the April 22 public hearing, but not on maps in the SEA. A new EIS is required to analyze impacts of this new and expanded disturbance in the GWNF that was not in earlier plans.

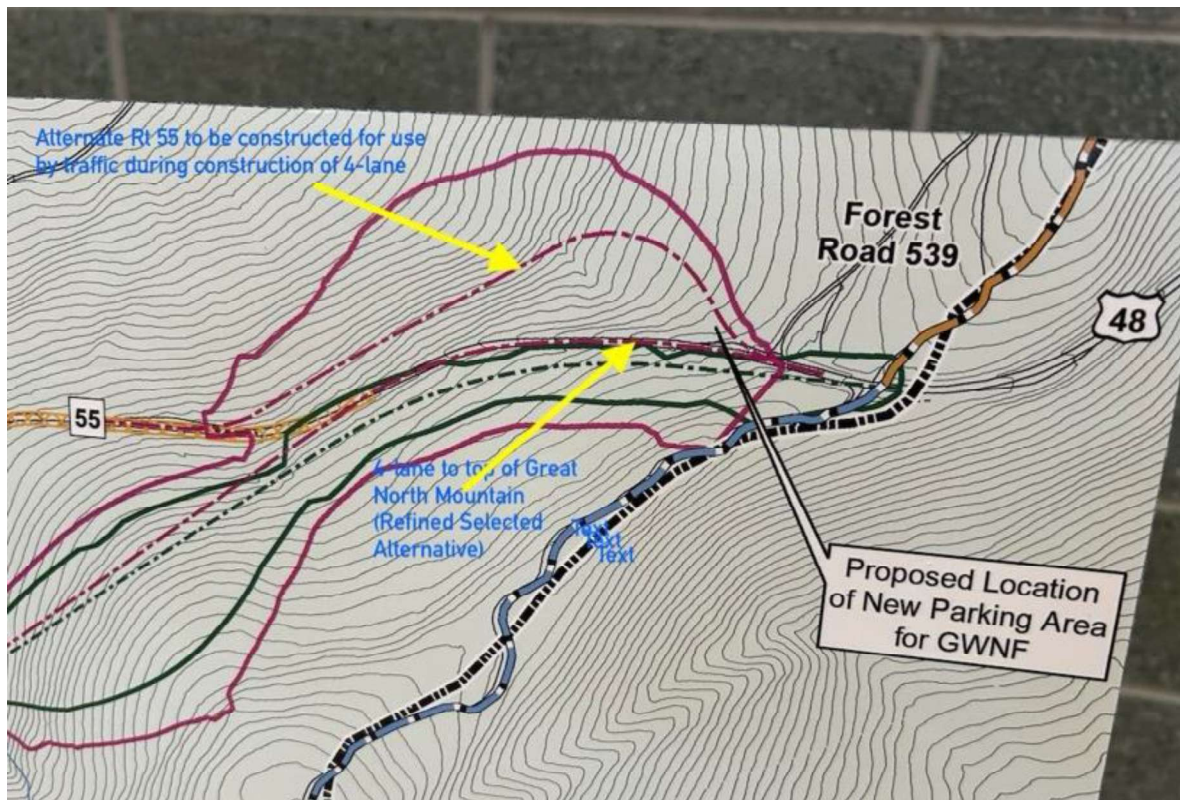


Photo of map on display at April 22 public meeting shows temporary alternate Rt. 55, but SEA maps do not show it.

- d. **Tuscarora/Great Eastern Trail safety issues.** Crossing Rt. 55 on these trails that follow the crest of Great North Mountain will become more hazardous to trail users if the Refined Selected Alternative is built. These National Forest trails are used by hikers, hunters, backpackers, equestrians and bicyclists. Some of this use includes organized events with many participants, like the Old Dominion Equestrian Endurance Ride. It is already difficult to cross SR 55 and would be much harder with faster traffic coming from the west. The EA does not address safety issues for trail users on these popular and important National Forest trails that are part of a larger network of trails.

- **Great Eastern Trail** – 1,600-mile trail that extends from NY to AL, considered a western alternative to the Appalachian Trail. Will be added to the US National Trails System, when fully completed.
- **Tuscarora Trail** - Established in the 1960's as an alternate route for the Appalachian Trail (AT), the Tuscarora Trail is a 250-mile-long trail through the Ridge and Valley Appalachians of Virginia, West Virginia, Maryland and Pennsylvania.



Photo on left below: Trailhead parking by curved Rt 55 heading east into VA. Photo on right: Rt. 55 heading into WV at trail crossing.



Speed will increase with the Refined Selected Alternative and result in more hazardous crossings for trail users.



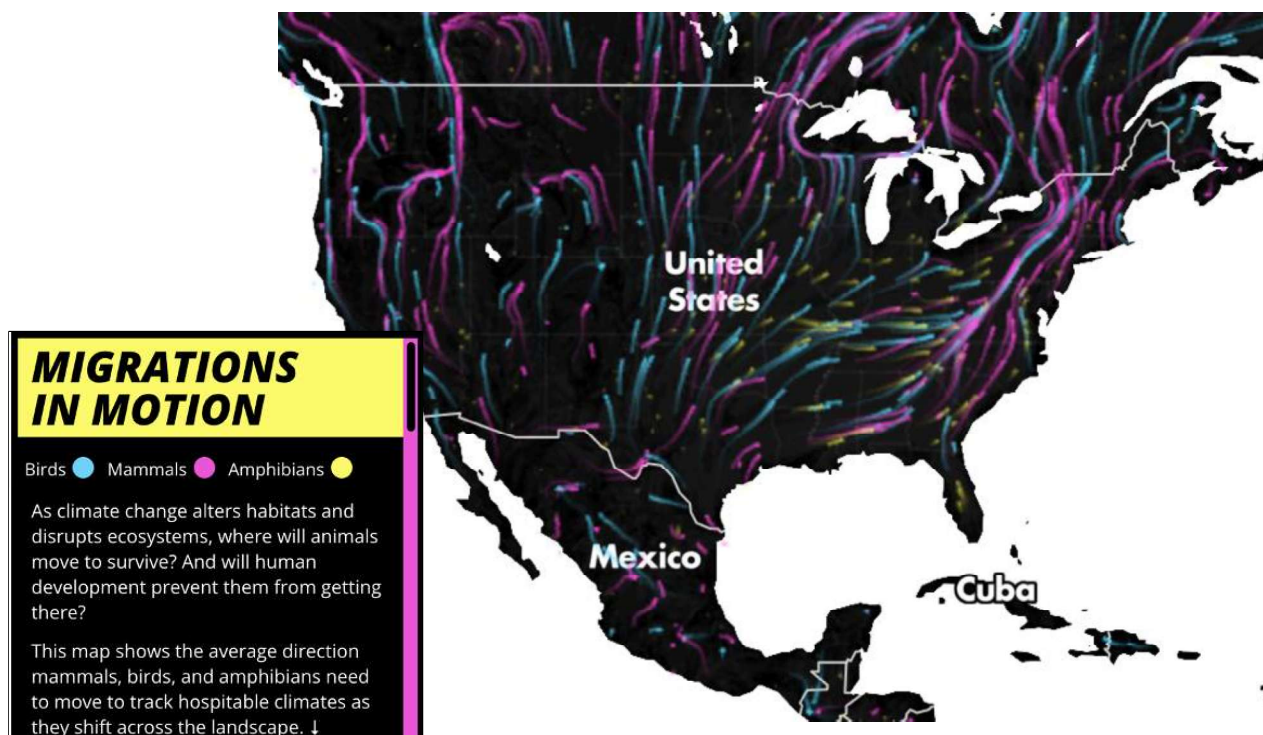
Building an overpass large enough to accommodate hikers, bikers, and equestrians may be the only solution to assure trail user safety. An overpass would be both costly, but necessary. Trail user impacts and accommodations are not discussed in the SEA. They should be considered more fully in a new EIS.

- e. **Parking Lot (Temporary).** The SEA indicates WVDOH will build a small parking lot for 5 cars and room for a truck and horse trailer, but, according to the engineers at the public hearing, this parking lot will be removed if Virginia decides to improve Rt 55 on the east side. This will leave trail users with no

option for trailhead parking and possibly no access to the Tuscarora/Great Eastern Trail. It is not clear in the SEA whether there will be an exit off the Refined Selected Alternative for trailhead access. A new EIS should analyze impacts on recreational access to GWNF resources by the public.

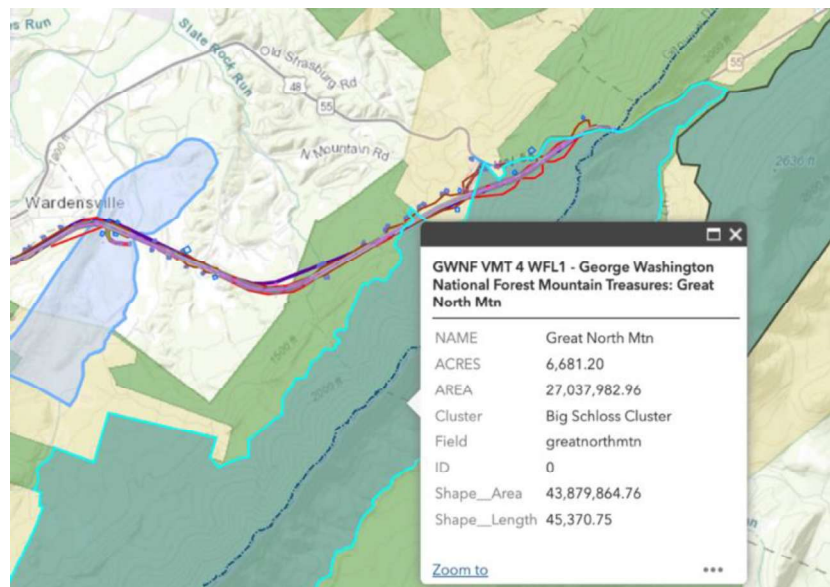
- f. **Migratory Corridor.** Great North Mountain is a migratory corridor for wildlife that provides a mostly undeveloped pathway for animals to migrate north to find suitable habitat as temperatures rise. A 5-lane divided highway would make it much harder for this migration to occur. The map showing Migrations in Motion is from The Nature Conservancy.

<https://www.maps.tnc.org/migrations-in-motion/#2.13/42.16/-59.36> Note that western VA and eastern WV are in the path of migrations from the south, southwest, and Mexico



- g. **Forest Fragmentation.** Forest fragmentation occurs when gaps and linear openings occur. This changes the nature of an interior forest, where many species of birds and mammals find just the right habitat they need, often [decreasing biodiversity](#). Forest fragmentation invites predators, such as raccoons, opossums, and skunks, that can eat the eggs of wood turtles and ground nesting birds and increase the risk and occurrence of tick-borne illnesses such as [Lyme disease](#). The Refined Selected Alternative would significantly increase forest fragmentation on Great North Mountain. Construction of a temporary Rt. 55 and extensive cutting and filling for the 5-lane would multiply the impacts on the full canopy forest now found on the GWNF. Yet, these impacts are not discussed in the SEA. This is yet another reason a new EIS is needed.

- h. **Virginia Mountain Treasures** (See Appendix: VMT) – The VWC and The Wilderness Society have compiled and published a list with descriptions of 63 wildland areas in the GWNF that should be protected from logging, road construction, and other forms of harmful development. These federally-owned lands, selected for their outstanding wild and natural values, include high-quality fisheries, mature and old-growth forests, wildlife habitat, backcountry recreation opportunities, intact watersheds and beautiful scenery. The Great North Mountain is one of these Virginia Mountain Treasures. See map below. At 6,681 acres, this area extends southwest from Rt. 55 and includes GWNF land in Hardy, Shenandoah and Frederick Counties. It includes tributaries of Paddy Run, Cove Run, Slate Rock Run and Waites Run. It offers remote habitat and solitude. The Tuscarora/Great Eastern Trail provides the only trail access to this area. Paul Gerhard Shelter is located four miles south of Rt. 55. The trails and the shelter are maintained by the Potomac Appalachian Trail Club.



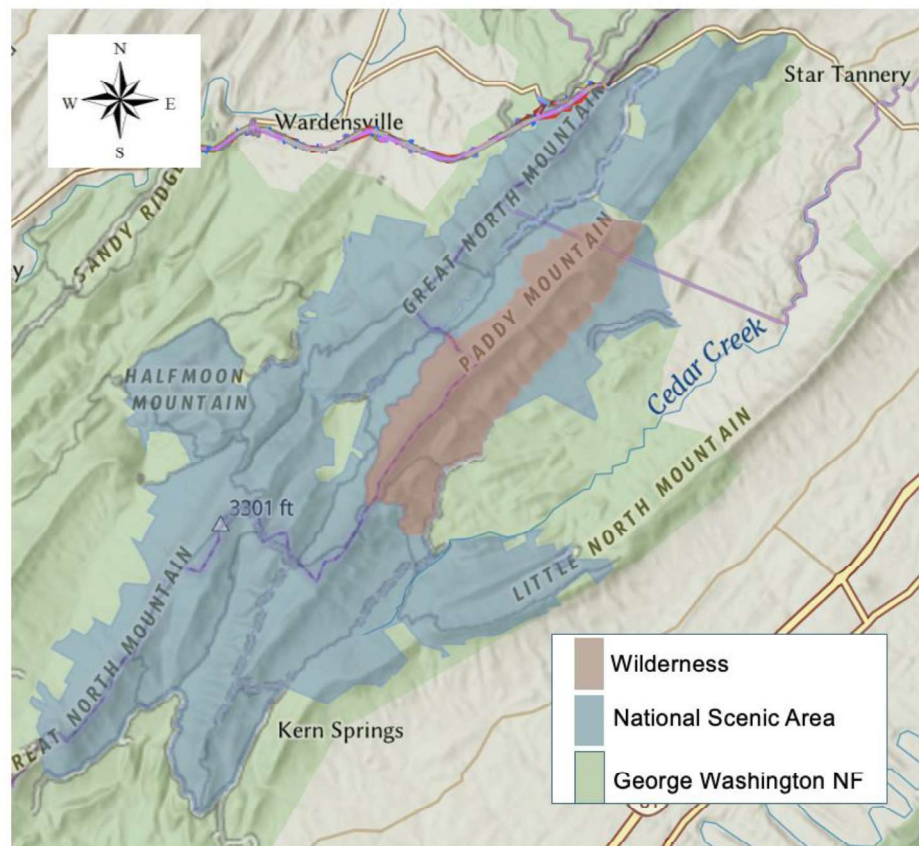
Refined Selected Alternative cuts through Great North Mountain (Virginia Mountain Treasure), with boundary line highlighted in turquoise. This is part of the Big Schloss complex of Virginia Mountain Treasures.

The Refined Selected Alternative would cut through the northeastern end of this Virginia Mountain Treasure (shown on the map in turquoise). Not only would it transform a portion of this forested wild area into a 5-lane road, but it would also increase edge effect which would be detrimental to several special plant and animal species and open the area to invasive plant species, such as ailanthus and mile-a-minute. Construction equipment could bring in seeds that would give invasives a start. Construction and use of the 5-lane would

degrade the Tier 3 trout streams through increased runoff and sedimentation, additional road salt, and potential herbicide runoff from roadside vegetation management. The 5-lane would also inhibit access by forest visitors and pose safety challenges at the trail crossing. Noise from construction and road use would elevate the sound level impacts and diminish the solitude users now enjoy.

- i. **Big Schloss Proposed National Scenic Area (NSA).** The Great North Mountain (Virginia Mountain Treasure) is part of the Big Schloss Proposed NSA. The Refined Selected Alternative would cut through the northern end of the Big Schloss proposed National Scenic Area. (See <https://www.vawilderness.org/big-schloss.html> for description of proposal.) Shenandoah County has included Congressional designation of this area in its long-range plan. The Big Schloss/Great North Mountain area is of primary importance for its recreational, scenic, and ecological values and is not an appropriate location for a 5-lane highway corridor.

Big Schloss National Scenic Area Proposal



The Refined Selected Alternative would pass through the Big Schloss National
Scenic Area Proposal

- j. **Impact on wood turtle.** The Eastern Panhandle of West Virginia is one of the last strongholds for the Wood turtle, which is a candidate for federal listing under the Endangered Species Act and is currently considered “Under Review” by the U.S. Fish and Wildlife Service. The Wood turtle population has declined dramatically in this region, largely due to habitat degradation and loss. Additional threats include being hit by vehicles while crossing roads, predation of nests by raccoons, and illegal collection. Although the SEA indicates a road crossing will be built for the Eastern wood turtle, some turtles will attempt to cross at other locations and will likely be killed. Road crossings have been documented as a major threat to the slow-moving wood turtle.

Since Virginia has shown no interest in extending Corridor H along Rt. 55 to I 81, it would offer many advantages to make safety improvements to the existing State Road 55 rather than build the Refined Selected Alternative. A project that focuses on improving the existing 2-lane Rt. 55 would:

1. lessen permanent impacts on the National Forest
2. comply with the GWNF Forest Plan Scenic Corridor management prescriptions
3. offer safer passage to hikers and other trail users crossing the road
4. support wildlife habitat and migration and protection of special species, like the Wood turtle
5. maintain a consistent 55-mph speed limit across Great North Mountain

while also meeting the Project’s identified purpose and need to improve east-west transportation.

In short, WVC has concluded that the Refined Selected Alternative for the Wardensville to Virginia State Line Project should not be built as currently planned. It is essential that WVDOH coordinate and collaborate with VDOT to find a solution to transportation needs that works for both states before selecting a route and building a road. A less destructive alternative would be to make safety improvements to Rt. 55 by widening and making a passing lane and turn lanes, where needed. This will increase safety, improve quality of life, and improve east-west transportation while costing far less. We urge WVDOH to do a new EIS and come up with an alternative that avoids crossing the national forest and harming its special resources and avoids creating a serious hazard to hikers, hunters, equestrians, and bikers using the Tuscarora/Great Eastern Trail. Please save FHWA and West Virginia resources that could be spent on more pressing needs.

Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in black ink, reading "Ellen Stuart-Haentjens". The signature is fluid and cursive, with the first name "Ellen" being more prominent.

Ellen Stuart-Haentjens
Executive Director
Virginia Wilderness Committee
P.O. Box 7257
Richmond, VA 23221
estuarthaentjens@vawilderness.org

Copied to:

Jason Workman, FHWA

Todd Stevens, VDOT Staunton District

Stephen Brich, VDOT Commissioner

U.S. Senator Mark Warner

U. S. Senator Tim Kaine.

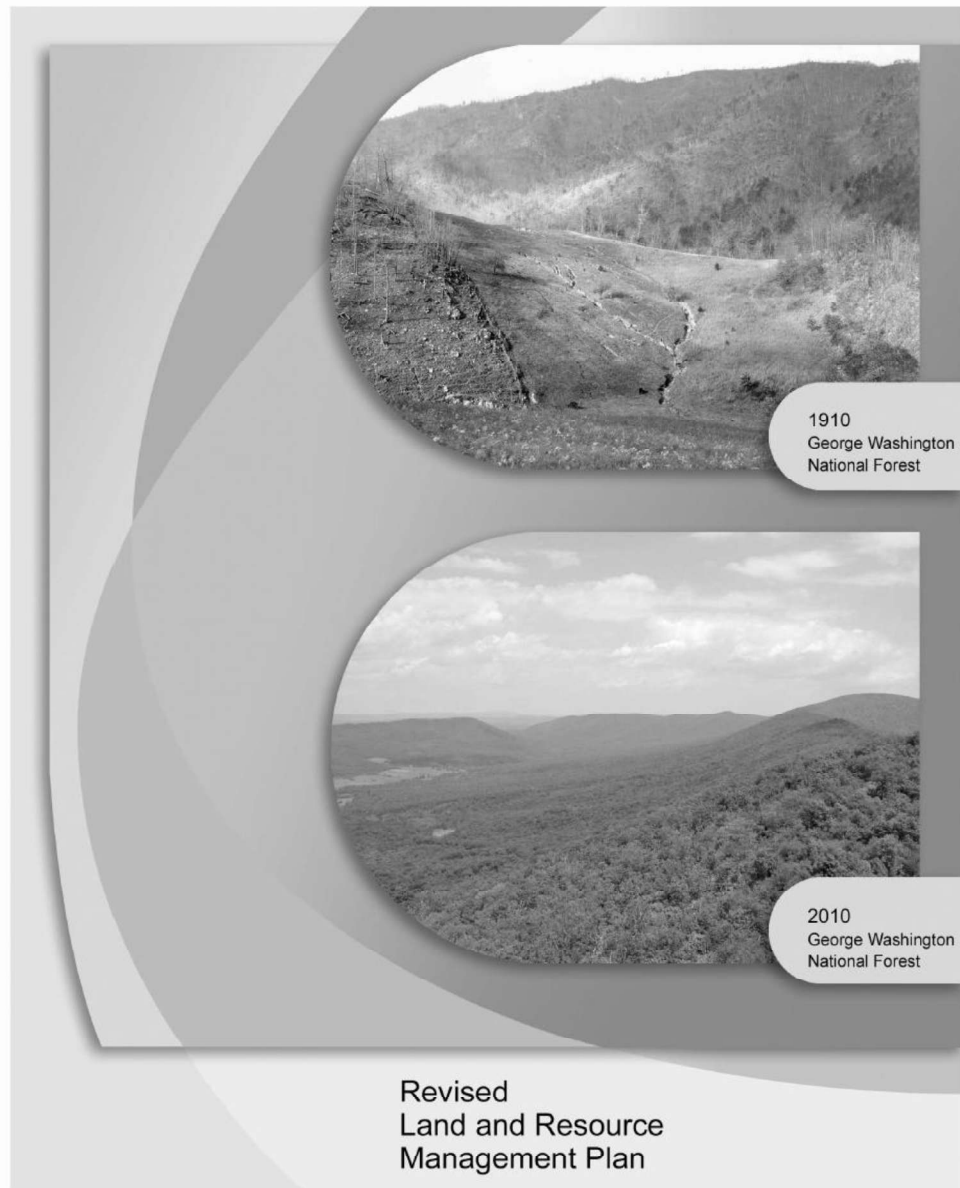
U. S. Congressman Ben Cline.

Virginia Senator Timmy French.

Virginia Delegate Todd Gilbert

Appendix

1. GWNF Plan: 7B Scenic Corridors prescription



Forest
Service

Region 8

George Washington
National Forest

R8-MB 143 A

November 2014

7B - SCENIC CORRIDORS

High quality scenery is provided in sensitive recreational and travelway settings. Examples include areas adjacent to gateway communities, areas around lakes, rivers, and backdrop areas viewed from major travelways and State-designated byways. The area visible during leaf-off for up to one-half mile from either side of the road typically defines the corridor. It also includes the visible middleground of the west face of Massanutten Mountain (a narrow strip) as seen from the Shenandoah Valley along Interstate 81. There are approximately 34,000 acres allocated to this management prescription area across the Forest. The scenic qualities of the landscape in these areas are maintained and their desired condition is described as follows:

Table 4-9. Sensitive Recreational Roads and Travelways

Interstate 64	State Highway 311
Amtrak Railroad Line	State Highway 55
Interstate 81	State Highway 130
US Highway 60	State Highway 39
US Highway 250	State Highway 42
US Highway 33	State Highway 924
US Highway 211	State Highway 850
US Highway 220	State Highway 770
US Highway 501	State Highway 629 north of Douthat State Park
State Highway 259	State Highway 629 south of Douthat State Park
State Highway 605	Forest Service Road 447
State Highway 718	Forest Service Road 125
State Highway 606	Forest Service Road 274
State Highway 687	Monongahela NF Forest Service Road 106
State Highway 56	

EMPHASIS

The emphasis is on providing, through maintenance or restoration and design, high quality scenery in sensitive recreational and travelway settings. Examples include areas adjacent to gateway communities, areas around lakes, rivers, and backdrop areas viewed from State-designated byways and major travelways.

DESIRED CONDITIONS FOR 7B - SCENIC CORRIDORS

DC 7B-01: These areas are characterized by high quality scenery in a setting conducive to a variety of recreational experiences. Human modifications are subordinate to the characteristic landscape. Landscape restoration and rehabilitation to meet high quality scenic conditions are a high priority. Coordination with nearby communities will help provide complementary management of adjoining lands.

DC 7B-02: The area provides exceptional opportunities for motorized recreation, especially scenic driving. The views along the corridors are natural appearing and include a variety of landscape characters, ranging from natural appearing to pastoral and historic/cultural, providing colorful accents and interesting textures, which change with the season. Visitors enjoy viewing wildlife in the occasional openings and meadows scattered throughout the forest. Water, geographic features, and cultural landscapes such as hay fields, grazing livestock, and the occasional rustic cabin provide scenic diversions to the predominately forested landscape. Road corridor improvements and interpretive facilities are evident changes to the natural environment, but these man-made alterations fit well with the character of the surrounding landscape. Other management activities are not evident to the average visitor.

DC 7B-03: The prescription area is easily accessed. Maintaining a good road surface and providing informational signs for protection of the natural and cultural resources as well as the safety and comfort of visitors minimize impacts of visitors within the prescription area.

DC 7B-04: Hiking, mountain biking, and horse trails are present throughout the prescription area. In addition to enjoying the scenery and using various trails, visitors may engage in photography, wildlife viewing, hunting, and fishing. Facilities are designed to harmonize with the desired landscape setting. Facilities might include roads, pullouts, overlooks, parking areas, trailheads, bulletin boards, interpretive kiosks, rail fences, signs, restrooms, and picnic sites. Trails through this area are well-marked and may include features for visitors with special access needs, loop systems, and/or interpretive programs.

DC 7B-05: The sights and sounds of other visitors and motorized vehicles may be present. The opportunity to encounter other visitors is high along roadways, at parking areas, pullouts, and overlooks, but may be moderate to low on trails away from congregated use areas. At points of highly developed recreational use, visitors take on low risk and are not challenged to rely on their own physical abilities and outdoor skills. Once away from the more developed areas, opportunities for solitude are available. In these more remote areas, visitors may take on some risk and be challenged to rely on their own personal physical abilities and primitive recreational skills such as bouldering, climbing, stream fording, and orienteering.

DC 7B-06: Vegetation is influenced both by natural processes and humans. Biological communities are maintained or improved to provide an attractive setting for visitors, while providing for the protection of rare communities and threatened, endangered, sensitive, and locally rare species. Forest management activities maintain the natural characteristics that make the area scenic. Up to 4% of forested land may be in early successional forest conditions created both naturally and purposefully to create visually diverse vegetation stages compatible with scenic values. Low intensity commercial timber harvest is appropriate to maintain the long-term goals of a diverse and vigorous forest with sensitivity to dispersed recreation and scenic values. Relatively longer rotation ages and a lower percentage of early successional forest in these areas reflect a low intensity approach to vegetation management and the higher priority of recreation and scenic values. Timber harvesting operations focus on what is retained in the stand, not on wood fiber production. Timber harvest practices are visually subordinate to the surrounding landscape. In the foreground of these areas, management activities are rarely evident to the casual observer.

DC 7B-07: These areas are characterized by a predominance of mid- and late-successional forests with a high to intermediate tolerance to shade. Forest structure varies according to ecological factors, but largely consists of a mature overstory of hardwoods, occasionally mixed with pines, a fairly open midstory, and a well-developed herbaceous and shrubby understory. Understory vegetation includes a variety of native deciduous and evergreen flowering trees, shrubs and wildflowers. Even- and uneven-aged forest communities are managed throughout the area, along with continued development of medium and small patches of late successional to old growth forest communities.

DC 7B-08: Wildlife species associated with mid- to late-successional deciduous forest habitats are expected to inhabit this area. Wildlife viewing opportunities are maintained and expanded through cultivation, mowing, and burning of openings and pastoral areas.

STANDARDS FOR 7B - SCENIC CORRIDORS

Terrestrial and Aquatic Species

- 7B-001** Wildlife and fisheries habitat improvements are allowed to enhance wildlife viewing, hunting, and fishing opportunities in accordance with scenic integrity objectives. Watchable wildlife species habitat improvements are encouraged.
- 7B-002** Existing old fields, pastoral areas, and wildlife openings may be present and maintained. Expansion of existing openings and/or creation of new openings may occur. Non-invasive non-natives are sometimes used when establishing food plants for wildlife, but native species are preferred. Some openings provide permanent shrub/sapling habitats as a result of longer maintenance cycles.

Vegetation and Forest Health

- 7B-003 Forest structure is managed to favor flowering trees and shrubs.
- 7B-004 Control insect and disease outbreaks, when necessary, to protect the scenic values, to reduce hazards to visitors, or for safety or legal reasons. Eradicate recently established non-native pests when possible. Favor the most effective control method.
- 7B-005 Allow vegetation management activities to:
- Enhance or rehabilitate scenery, including:
 - Create aesthetically desired stand structure and species composition including a pleasing mosaic of tree species of various densities and stem sizes, park-like effects, and enhancement of fall color species;
 - Feature flowering trees, character trees, and shrub species;
 - Maintain open areas, old field habitats, pastoral settings, and vistas that enhance the scenic qualities of the corridor;
 - Maintain developed recreation facilities, including roads and trails;
 - Enhance both game and non-game wildlife habitat;
 - Improve threatened, endangered, sensitive, and locally rare species habitat;
 - Maintain rare communities and species dependent on disturbance;
 - Reduce fuel buildups;
 - Minimize impacts from insect or disease outbreaks and rehabilitate damaged areas;
 - Control non-native invasive vegetation; or
 - Provide for public health and safety.
- 7B-006 Salvage of dead, dying and damaged trees using ground based or helicopter logging can occur in scenic corridors and viewsheds to provide for scenic rehabilitation and public safety.

Timber Management

- 7B-007 Timber production is a suitable use in these areas. Some portions of the areas are identified as unsuitable for timber production due to the timber suitability analyses in Appendix C. Timber harvest practices are modified to recognize and enhance the aesthetic and recreational values of these lands.
- 7B-008 Group selection, individual tree selection, thinning, and shelterwood harvests are predominately used.
- 7B-009 Clearcutting may only be used to open up vistas, create spatial diversity along travelways, decrease straight line effect of cleared utility corridors, create watchable wildlife openings, for insect and disease suppression, or for scenic rehabilitation.

Wildland Fire Management

- 7B-010 Vegetation management may be accomplished with wildfires and prescribed fire along with mechanical treatments as an appropriate method of reducing costs associated with these activities.

Recreation

- 7B-011 Interpretive services including trails, signs, viewing areas, self-guided programs, and buildings may be provided to enhance the understanding of, and appreciation for the natural environment, and cultural resources.

Scenery

7B-012 Management activities are designed to meet or exceed the following Scenic Integrity Objectives:

Inventoried Scenic Class	1	2	3	4	5	6	7
Scenic Integrity Objectives	H	H	M	M	M	M	M

H=High; M=Moderate

7B-013 Short-term scenic integrity objectives of rehabilitation and enhancement may be used until scenic integrity objectives are achieved.

Minerals

7B-014 These corridors and viewsheds are suitable for federal oil and gas leasing with controlled surface use to protect the scenic resources and values. Other Federal minerals may be available on a case-by-case basis after full consideration of effects on scenic resources and values.

7B-015 Permit mineral materials for commercial, personal, free, and administrative use purposes with conditions to protect the scenic resources and values.

7B-016 Permit new borrow pits, provided they meet the scenic integrity objective. Rehabilitate or reclaim existing borrow pits that are currently not meeting the scenic integrity objective, after coordinating between resources to determine if a current need for borrow exists by the Forest Service or partner State or County agency.

7B-017 Consider opportunities to provide interpretation of interesting geologic or fossil features along roadsides, including in borrow pits.

Roads

7B-018 Permit new access roads, provided they quickly enter and leave the seen area and do not parallel existing travelways.

7B-019 All roads, facilities, and signing are designed to blend in with surroundings.

Lands and Special Uses

7B-020 These areas are unsuitable for designation of new utility corridors, utility rights-of-way, or communication sites. Continue existing uses. Require necessary mitigation techniques, including screening, feathering, and other vegetation management techniques to mitigate the visual and other impacts of new or upgraded, utility corridors or communication sites.

7B-021 Allow agricultural special-use authorizations to maintain open and pastoral spaces.

7B-022 Authorize other special uses if consistent and compatible with the goals and objectives of this area.

7B-023 These areas are unavailable for wind energy development.

2. VMT

Virginia's Mountain Treasures



The Unprotected Wildlands of the George Washington National Forest



A report by The Wilderness Society



The Unprotected Wildlands of the George Washington National Forest

The wildlands in this report — 63 areas totaling about 602,432 acres — are special places that should be protected from logging, road construction, and other forms of harmful development. These federally owned lands, selected for their outstanding wild and natural values, include high-quality fisheries, mature and old-growth forest, wildlife habitat, backcountry recreation opportunities, intact watersheds, and beautiful scenery.

Although many ecosystems of the central Appalachians have been degraded by past environmental impacts, these Mountain Treasures offer a unique opportunity for us to retain a system of large, connected, and unfragmented natural areas, providing habitats for forest-dwelling plants and animals and genetic reservoirs for the future.

The region's remaining natural areas are coming under increasing assault from road construction, logging, and motorized recreation. It is essential to maintain the size and connectedness of the National Forest roadless areas in order to provide for wildlife movements, genetic interchange, and the functioning of natural ecological processes.

Some of these Mountain Treasures were identified and "inventoried" in the Roadless Area Review and Evaluation II (RARE II) conducted by the Forest Service in the late 1970s. These areas received initial protection under the 2001 Roadless Area Conservation Rule, although the status of that rule is still in doubt. Many of these areas would be suitable for Congressional Wilderness or National Scenic Area designation. (For acreages of "Inventoried Roadless Areas", see the Summary Table.) The Forest Service also evaluated eligible waterway segments for possible recommendation as wild and scenic rivers.

Currently, only about 4% of the George Washington National Forest is permanently preserved as Wilderness — about 43,600 acres. This is well below the national average of 18% for National Forest acreage. The six Wilderness Areas on the Forest are generally small, averaging about 7,300 acres — far below the national average for national forest Wilderness of around 40,000 acres. For the environment and our quality of life, more and larger

Wilderness areas are needed. The Forest has only one designated National Scenic Area. Mount Pleasant is 7,748 acres.

Under the current forest plan adopted in 1993, the Forest Service established a variety of administrative categories to designate special areas for their values as biological sites, backcountry recreation, scenery, and watershed protection. This usually ensures that these lands are protected from logging and road construction during the 10-15-year life of the forest plan. However, such protections are not permanent and can be altered or rescinded by agency action.

Roads are, of course, one of the most serious issues in contemporary conservation. Roads produce habitat fragmentation, edge effects, problems with access, and other impacts. As of 2003 there were 1,790 miles of classified system roads within the George Washington National Forest. In addition, an enormous number of "temporary" roads (certainly hundreds of miles), which have been constructed for logging and other management purposes, are not maintained by the Forest Service and do not figure in the agency's inventories. Though "temporary", their impact will be discernable for a lifetime.

In the selection of Treasures proposed for protection, attempts were made to identify areas with few or no roads, to keep watersheds intact, and to cluster areas to form wildlife corridors and reduce fragmentation. One area in particular, Shenandoah Mountain, deserves mention as the largest and least fragmented block of contiguous wildlands remaining in the Central Appalachians.

Eleven clusters of Mountain Treasures have been identified on the GWNF's five Ranger Districts. The bulk of these lands are on the west side of the Valley, in the Ridge and Valley physiographic province. The Pedlar RD, however, on the east side of the Valley, is part of the Blue Ridge Mountains province; and a small portion of the Warm Springs RD lies in the Allegheny Mountains & Plateau province. The lands of the GWNF are situated in two major watersheds, the James River and Potomac River, both of which drain into the Chesapeake Bay.

The peaks and ridges of the GWNF are some of the driest lands in the East. Most precipitation falls on the western slopes of the Allegheny Plateau and eastern slopes of the Blue Ridge. Lying in this double rain shadow, the bulk of the Forest only averages about 35 inches of precipitation annually. The lands constituting the GWNF are some of the steepest, rockiest, driest, thin-soiled, most remote, and most difficult to access in the state. Consequently, from a commercial timber perspective, they are of relatively poor value economically.

Nevertheless, this has not prevented the development of beautiful old-growth on the Forest. Shenandoah Mountain in particular has a concentration of such sites. Old-growth forest provides many unique benefits for fish and wildlife, recreation, scenery, and overall biodiversity. The Forest Service has done a preliminary identification of "possible" old growth on the GWNF, based on the agency's computerized database of ages for each individual "stand" on the Forest (there are over twenty thousand of these). Depending on the type of forest, "stands" must generally be at least 100-150 years old to potentially qualify as old-growth. Despite the use of the Regional Old-Growth Guidance issued by the Forest Service in 1997, the cutting of old-growth forest continues on the GWNF.

This landscape of the GWNF is one of extremes. The lowlands in the Shenandoah Valley are heavily developed, with the I-81 corridor, manufacturing, municipalities, suburban sprawl, and industrial agriculture contributing to streams with poor water quality. In contrast, the headwaters of these drainages, many of which lie within the GWNF, retain some of the best water quality in the region. Unfortunately, in addition to direct management threats from within, the Forest's aquatic and terrestrial ecosystems are at risk of degradation from air pollution and acid precipitation from outside the area.

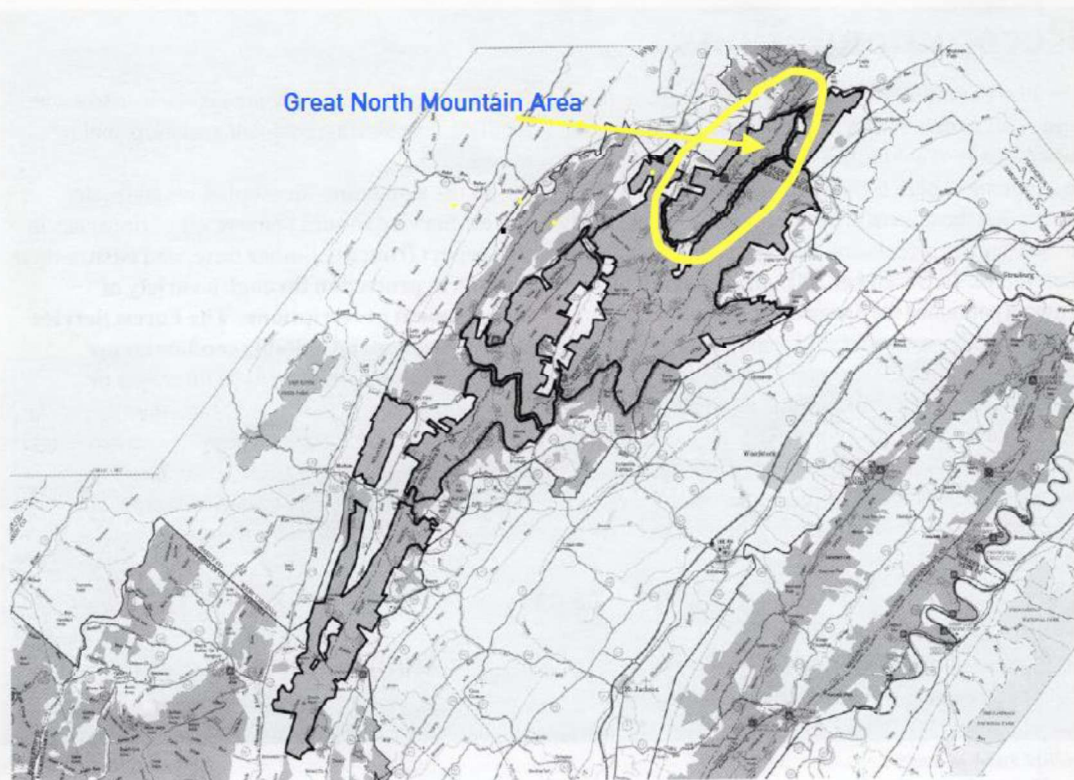
Both the Forest's content and its context must be kept in mind in our conservation decisions. The fragmented and degraded quality that characterizes

much of our landscape limits us to thinking "small" as the norm in contemporary conservation. The 1.1 million acre GWNF in its entirety and these Mountain Treasures in particular give us the rare chance to think "Big" in the East. To pass up this remarkable opportunity will be to betray not only science and reason, but also life and all the generations who follow us.

Many of these Treasures possess outstanding wilderness attributes and would be invaluable additions to the National Wilderness Preservation System. Others would make excellent National Scenic Area candidates. While some Treasures may not be suitable for Wilderness designation, they have the potential to recover from past degradation. If not further disrupted, they will be of ever growing value in maintaining the biological diversity and ecological integrity of the region.

With increasing population and development pressures, places to escape to the "sounds of silence" and enjoy nature's song are increasingly rare in our landscape. Places to be treasured, they are where the wild things are. These remote sanctuaries are our natural heritage and a vital necessity for sustaining the health of not only ourselves, but also all that we call home. They are where we go to hike, camp, watch birds, mountain bike, hunt, and fish. *In a sea of noise and development, this place we call the George Washington National Forest is nothing less than a modern-day Ark, precious and irreplaceable.*

The maps used in this report are the Forest Service recreation maps for the George Washington National Forest, dated 1983, and available from the agency for \$6.75 each. On the maps in this report, a heavy black line denotes the general boundary of the wildland. Broken lines indicate that an area extends beyond the Virginia boundary into West Virginia and the Monongahela National Forest. Shaded areas represent land in federal ownership. Heavily shaded areas are designated Wilderness or the Shenandoah National Park. Unshaded areas are private land. The cluster maps are much reduced in scale, and vary in scale to fit the page.



Big Schloss Cluster

**Jonnies Knob
Great North Mountain
Falls Ridge
Church Mountain**

Straddling the Virginia/West Virginia state line on the Lee Ranger District is the Big Schloss cluster. There are seven areas totaling around 71,000 acres.

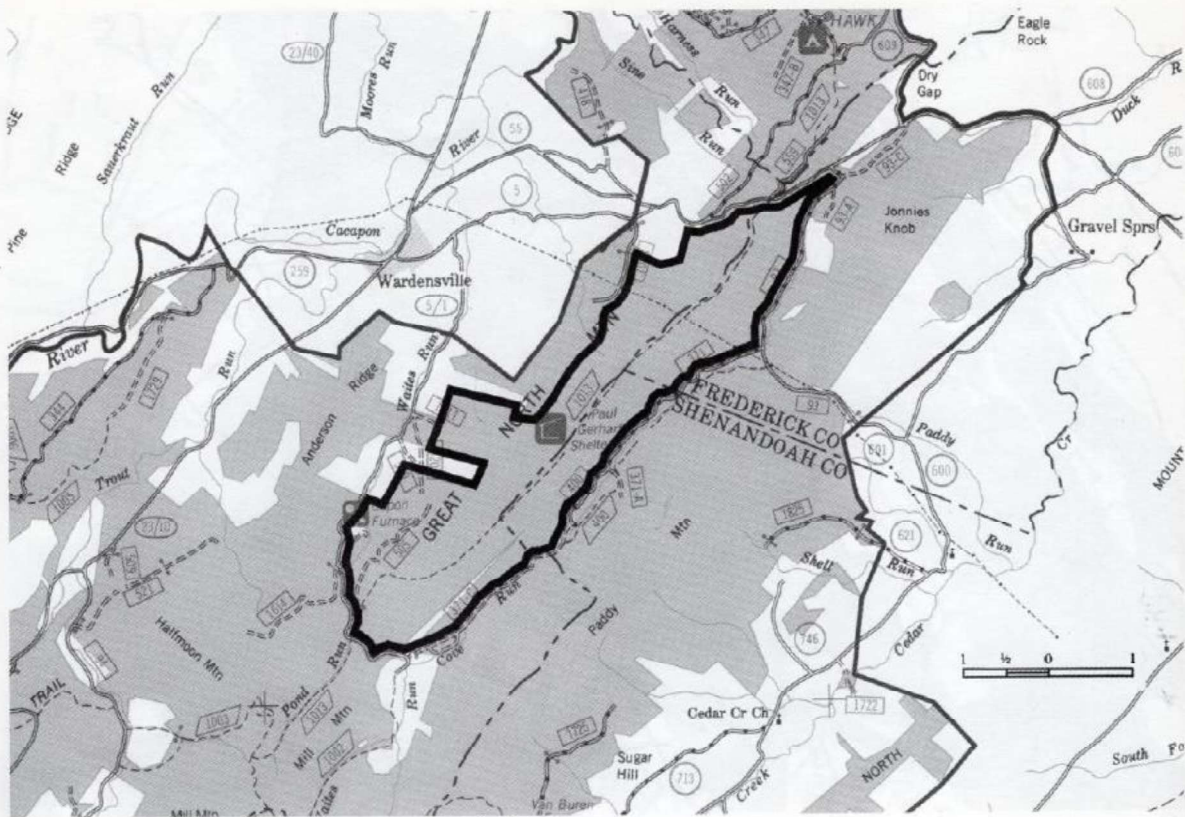
The terrain here features the narrow, linear mountains characteristic of the Ridge & Valley province. More than in other areas of the George Washington National Forest, rocky slopes, outcrops, and crags here are common. Perhaps the best known of these occurrences is found at the summit of Big Schloss (German for "Castle"). At approximately 31,000 acres, Big Schloss is also one of the largest roadless tracts to be found in the eastern National

**Big Schloss
Long Mountain
Cove Mountain**

Forests. Elevations range from 1500 to 3300 feet above sea level.

These Mountain Treasures embrace the headwaters for the Potomac and the North Fork of the Shenandoah River. Hiking trails traversing these Treasures are numerous, as are the opportunities to escape from the sights and sounds of industrialization.

Much of the Big Schloss cluster is within a two hour drive from Washington, D.C. These wildlands have no permanent protection from resource extraction, and unfortunately, logging in these Mountain Treasures, particularly their lower slopes, is common.



Great North Mountain

This large section of Great North Mountain lies astride the state line northeast of Capon Furnace. This roadless tract is adjacent to and contiguous with the "inventoried" Big Schloss Roadless Area. The area meets the requirements for being officially designated a roadless area, but it was not.

The steep slopes of Great North Mountain support the tributaries of Paddy Run, Cove Run, and Slate Rock Run. Elevations here range from 1800 feet to 2700 feet above sea level with mixed oak woodlands predominant. Remote habitat and solitude can be found in the interior of the Great North Mountain area.

The Tuscarora Trail, running from the Shenandoah National Park to Blue Mountain in Pennsylvania, traverses the stateline/ridgecrest for seven miles, connecting US 55 to FDR 371. The Paul Gerhart Shelter is midway on this trail. The Gerhart Shelter Trail connects the Tuscarora to Paddy Run to the east.

Great North Mountain contains 756 acres of possible old growth.

Approximate Size: 6681 acres

Location: Frederick and Shenandoah Counties, Virginia and Hardy County, West Virginia in the Lee District

Topos: Wardensville